

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION,

Plaintiff,

V.

TEAM LENDING CONCEPTS, L.L.C.

Defendants.

Case No.

03-75136

COMPLAINT AND  
JURY DEMAND

VICTORIA A. ROBERTS

NATURE OF THE ACTION MAGISTRATE JUDGE CAPEL

This is an action under Title VII of the Civil Rights Act of 1964 and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of sex, and to provide appropriate relief to Glenroy Beckford who was adversely affected by such practices. Plaintiff United States Equal Employment Opportunity Commission ("Commission" or "EEOC") alleges that Glenroy Beckford was retaliated against by Defendants Team Lending Concepts, L.L.C. ("Defendants" or "Employers") and was ultimately terminated for complaining about sexual harassment.

JURISDICTION AND VENUE

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451, 1331, 1337, 1343, and 1345. This action is authorized and instituted pursuant to Sections 706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e-5(f)(1) and (3) and 42 U.S.C. § 2000e-6(c) ("Title VII"), and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981(a).

2. The employment practices alleged to be unlawful were committed within the jurisdiction of the United States District Court for the Eastern District of Michigan, Southern Division.

3. Plaintiff EEOC, is the agency of the United States of America charged with the administration, interpretation and enforcement of Title VII, and is expressly authorized to bring this action by Section 706(f)(1) and (3) of Title VII, 42 U.S.C. §§ 2000c-5(f)(1) and (3).

4. At all relevant times, Defendants have continuously been corporations doing business in the State of Michigan and the City of Detroit, and have continuously had at least fifteen (15) employees.

5. At all relevant times, Defendants have continuously been employers engaged in an industry affecting commerce within the meaning of Sections 701(b), (g), and (h) of Title VII, 42 U.S.C. §§ 2000c(b), (g), and (h).

#### **STATEMENT OF CLAIMS**

6. More than thirty days prior to the institution of this lawsuit, Glenroy Beckford ("Beckford") filed a charge with the Commission alleging violations of Title VII by Defendants. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. Since at least May 2002, Defendants have engaged in unlawful employment practices at their Farmington Hills, Michigan facility, in violation of Section 703(a), 42 U.S.C. §2000c-2(a). The unlawful employment practices include the following:

- a. Beckford complained about sexual harassment in early June of 2002, Respondent discharged Beckford on August 19, 2002 in retaliation for he engaged in protected activity, i.e., complaining about sex harassment.
- b. At the time of his retaliatory discharge, Beckford had ample work and there was

no performance based reason for his discharge.

8. The effect of the conduct complained of in paragraph 7 above has been to deprive Beckford of equal employment opportunities and otherwise adversely affect his status as an employee because of his sex.

9. The effect of the conduct complained of in paragraph 7 above has been to deprive Beckford of equal employment opportunities and otherwise adversely affect his status as an employee because of his sex.

10. As a result of the unlawful employment practices complained of in paragraphs 7, 8 and 9 above, Beckford has suffered pecuniary compensatory damages and non-pecuniary compensatory damages in the nature of emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and lost wages.

11. The unlawful employment practices complained of in paragraphs 7, 8 and 9 above were intentional.

12. The unlawful employment practices complained of in paragraphs 7, 8 and 9 above were done with malice or with reckless indifference to Beckford's federally protected rights.

#### **PRAYER FOR RELIEF**

Wherefore, the Commission respectfully requests that this Court:

- a. Grant a permanent injunction enjoining Defendants, their officers, successors, assigns, and all persons in active concert or participation with Defendants, from engaging in retaliation.
- b. ORDER Defendants to provide mandatory training regarding Title VII and its prohibition against sexual harassment and retaliation to all management and non-management employees.

- c. ORDER Defendants to institute and carry out policies, practices and programs which provide equal employment opportunities for its employee, and which eradicate the effects of their past and present unlawful employment practices.
- d. ORDER Defendants to make whole Glenroy Beckford by providing the appropriate amount of back pay with prejudgment interest, in an amount to be proved at trial, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices, including but not limited to rightful-place reinstatement.
- e. ORDER Defendants to make whole Glenroy Beckford by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described in paragraphs 7, 8 and 9 above in amounts to be proven at trial.
- f. ORDER Defendants to make whole Glenroy Beckford by providing compensation for past and future non-pecuniary losses resulting from the unlawful practices complained of in paragraph 7 above in amounts to be proven at trial.
- g. ORDER Defendants to pay Glenroy Beckford punitive damages for their malicious or reckless conduct described in paragraph 7 above in amounts to be proven at trial.
- h. Grant such further relief as the Court deems necessary and proper in the public interest.
- i. Award the Commission its costs of this action.

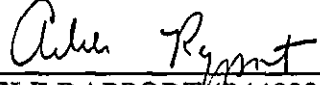
**JURY TRIAL DEMAND**

The Commission requests a jury trial on all questions of fact raised by its complaint.

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